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# California Regional Water Quality Control Board

## San Diego Region

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**Gray Davis**  
Governor

TO: John H. Robertus  
Executive Officer

FROM: David Hanson  
Water Resource Control Engineer

DATE: June 6, 2003

SUBJECT: Draft Responses to Comments on the May 9, 2003 Tentative Addendum No. 1 to Order No. R9-2002-0025, NPDES Permit No. CA0107409 Modifying the Monitoring and Reporting Program for the City of San Diego, E.W. Blom Point Loma Metropolitan Wastewater Treatment Plant Discharge to the Pacific Ocean though the Point Loma Ocean Outfall

The Regional Water Quality Control Board, San Diego Region (Regional Board) and U.S. Environmental Protection Agency (USEPA) jointly circulated Tentative Addendum No. 1 to Order No. R9-2002-0025 and Draft NPDES Permit No. CA0107409 modifying the monitoring and reporting program for the City of San Diego (City), E.W. Blom Point Loma Metropolitan Wastewater Treatment Plant (PLMWTP) Discharge to the Pacific Ocean though the Point Loma Ocean Outfall on May 9, 2003 for public comment.

To date one comment letter has been received, a letter from Ed Kimura on behalf of the Sierra Club, San Diego Chapter. Below are joint responses to comments prepared by the Regional Board and USEPA:

**Ed Kimura, Sierra Club, San Diego Chapter (letter dated May 27, 2003):**

**Comment #1:** "Section A. General Monitoring and Reporting Provisions. The monitoring data should be available to the public in electronic format (Excel) either on line or on CD's."

**Response:** General Provision No. 22 requires the City to submit all influent, effluent, and receiving water data annually to USEPA for inclusion in its STORET database. However, it is acknowledged that other data formats may be more convenient for specific users. In discussions with Regional Board and USEPA staff, the City has indicated that they are working toward making data available on the Internet, and that until such a system is in place, they will provide monitoring data in other formats upon request.



**Comment #2:** “Section B, page 7. It appears in the 3<sup>rd</sup> paragraph that the definition of the System Influent contains an editorial comment “[make sure this term has been previously defined]” has not been defined and should be corrected.”

**Response:** NCWRP will be defined as the North City Water Reclamation Plant in the final version of Addendum No. 1.

**Comment #3:** “Section D.1.b, Microbial sampling measures enterococcus at 36 offshore stations for the purpose of tracking the wastewater plume. Because of the time required to obtain these samples (days) and the die-off rate the enterococcus, there will be a data latency issue that must be considered in order to correlate these data with the special studies (viz., remote sensing data program). The station sequence used to obtain the enterococcus data may also be important to obtain reliable plume tracking data. The point to be made is that the microbial sampling procedures should be integrated with the special studies that include remote sensing and special in-situ oceanographic monitors.”

**Response:** The City is currently coordinating the schedule for offshore bacterial sampling with aerial flyovers performed by Ocean Imaging. However, the commenter is correct in noting that there may be a timing issue if the collection of offshore bacterial samples (typically a 3 day effort) is not at the same time-scale as the remote sensing data. The special study evaluating the monitoring program required by Section D.2.a will address use of remote sensing data to interpret water quality samples as they relate to tracking the fate of the wastewater plume.

**Comment #4:** “Section D.1.c, Sediment monitoring consists of 12 primary core stations plus 10 secondary stations. We believe that it is premature to assume as it is implied here that even the total 22, let alone the 12 primary core, stations are sufficient to provide the needed spatial sampling. These stations lie along constant depth contours, essentially parallel to the coast. Sediment monitoring should assess the various sources of the contaminants, not just the outfall and the dredging disposal site, LA-5 but from the re-suspension and re-deposition of contaminants due to factors such as bioturbation, current flows, seasonal upwelling from deep depths, etc. We believe that a conceptual model taking these factors into account together with a statistical analysis to determine the spatial sampling size and location of the core stations are needed. Sediment monitoring at the deeper depth contours should be included in the special studies. Deep ocean impacts of the effluent discharged from the outfall are sorely needed. Sediment toxicity has not been included as part of the special studies. We support the Southern California Coastal Water Research Project Report “Model Monitoring Program for Large Ocean Dischargers in Southern California” recommendation to include sediments toxicity measurements thereby completing the sediment quality triad consisting of sediment chemistry, benthic community, and toxicity measurements for assessing the impact of pollution on marine life.”



**Response:** The changes to the sediment monitoring program reflect the recommendations of the Southern California Water Research Project report titled "Model Monitoring Program for Large Ocean Dischargers in Southern California". The 12 primary and 10 secondary core sediment monitoring stations represent the trend component of the sediment monitoring program which focuses on long-term changes over time at historically monitored sites. This is used to evaluate whether concentrations of contaminants are increasing or decreasing at core stations in the area around the outfall. This question can be addressed by sampling a relatively small number of sites over time. The proposed design consisting of 12 to 22 samples is more than adequate to address the trends question.

A different design is needed to accurately map the spatial extent of the area impacted by the discharge. A program of increased number of stations to be sampled at a reduced frequency has been proposed as the most efficient design for periodically mapping outfall-related sediment effects. Section D.2.b contains requirements for a separate sediment mapping study to be conducted in 2004. This study involves intensive sediment sampling to determine the optimal design (location and number of sites and distance between sites) for mapping patterns in sediment grain size, chemistry and benthic communities around the outfall. This will form the baseline for evaluating changes in the extent or magnitude of outfall-related sediment effects in future years.

Section D.3 requires that the discharger participate in regional monitoring activities coordinated by the Southern California Coastal Water Research Project. Bight'03 will include deep ocean sediment testing, including sediment toxicity, in areas potentially influenced by the PLOO. In addition, the special study evaluating the monitoring program required in Section D.2.a will address the issue of Deep Ocean monitoring and sediment toxicity testing.

**Comment #5:** "Section D.2. Strategic Process Studies represents a critical element of the Tentative Addendum. The adaptive management aspect allows resources to focus on specific issues that the core monitoring program does not address or those that arise during the normal monitoring program. The remote sensing efforts as demonstrated by the Ocean Imaging and Scripps Institute of Oceanography presentations in the May 2003 RWQCB meeting are revealing new and very important physical oceanographic data that are directly applicable to the ocean monitoring program. It is essential to jointly design the remote sensing program and the in-water data measurements program in order to effectively fuse these separate data sources together, thus providing a powerful method to determine the cumulative impact of the ocean outfall effluents and other sources of pollution on the marine environment."

**Response:** The Regional Board and USEPA agree that the special studies represent a critical element of the revised monitoring and reporting program. It is also our intent that the remote sensing program be coordinated with in-water data measurements as the commenter suggests. The special study evaluating the monitoring program required by Section D(2)(a) will provide further opportunity to coordinate remote and in-situ monitoring technologies.